

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

ORDER NO. 95-210

SITE CLEANUP REQUIREMENTS FOR:

EATON CORPORATION,
SIGNETICS CORPORATION,
JOHN D. STODDARD TRUST, AND
PAINWEBBER QUALIFIED PLAN PROPERTY FUND FOUR, L.P.

for the property located at

680 WEST MAUDE AVENUE
SUNNYVALE
SANTA CLARA COUNTY

The California Regional Water Quality Control Board, San Francisco Bay Region (hereinafter the Board), finds that:

1. **Site Location:** The property located at 680 West Maude Avenue in Sunnyvale (Site) is located on flat to gently sloping terrain, along the southwestern side of the southern end of San Francisco Bay (See Site Map). The area surrounding the Site is dominated by low rise industrial buildings common in the electronics industry of Santa Clara County. The majority of these buildings were constructed in the late 1960s and early 1970s. Mixed commercial and light industrial land uses are also common in the area immediately surrounding the Site.

The Site is bounded on the north by West Maude Avenue, on the south and west by light industrial properties and on the east by Oroweat Bakery. Moffett Field Naval Air Station is less than a mile to the north, Highway 101 lies approximately one-half mile to the north, and Mathilda Avenue is one block to the east. The Site consists of the single story building, paved parking surfaces and typical landscaping found at many other light industrial complexes.

2. **Site History:** In or about 1961 the original building was built by Peery Realtors, the owners of the Site. Signetics Corporation ("Signetics") shortly thereafter leased and entered the facilities. Signetics researched, developed, and fabricated semiconductors

there from mid 1962 through 1963. In 1964, fabrication, assembly and test operations moved to 811 East Arques Avenue, Sunnyvale, while limited administrative and research and development remained at the 680 Site. In 1968, research and development moved to 811 East Arques, and Signetics terminated their lease. Peery Realtors owned the Site from February 1961 to May 1967, the period of Signetic's tenancy. All accounts for Peery Realtors have been liquidated.

The prototype operations conducted at Signetics included work stations that used trichloroethene (TCE) for spraying and dip bath operations, including sinks and drains. The wastewater from these operations were sent via piping to a newly constructed wastewater neutralization tank for pretreatment prior to discharge to the city sewer system. A limited amount of TCE accumulated in the neutralization tank until pumped out by a chemical service company. During recent litigation depositions it was noted that the neutralization tank was periodically inspected to insure proper operation and in response to an interrogatory a Signetics employee stated that no government standards were violated. In addition to the spraying and dip bath operations, TCE was also used in small amounts at a degreaser at the Site. The waste TCE generated in the degreaser was collected in a drum and stored outside the building on a concrete pad until it was periodically picked up by a service company.

Beginning in 1974, Addington Laboratories (predecessor in interest to Eaton Corporation) manufactured electronic microwave components and semiconductors and included electroplating, anodizing, and chemical etching and milling operations. Prior to Eaton's operation at the Site, Eaton's Manager of Manufacturing for its Semiconductor Division made substantial modifications to the facility's wastewater handling system, including a modification to the interior of the building to add an acid waste system with all new plumbing above ground, the selection of a new location for the neutralization tank, and the installation of a new 6-inch drain line. The manufacturing processes involved the use of acids, bases, and various organic solvents, including TCE. Operations continued at the Site until March 1985. Addington was acquired by Cutler-Hammer in 1979 and Cutler-Hammer was acquired by Eaton Corporation ("Eaton") shortly thereafter. The John D. Stoddard Trust owned the Site from May 1973 to March 1985, the period of Addington's and Eaton's tenancy.

Eaton was authorized to discharge treated wastewater to the sanitary sewer system in accordance with the City of Sunnyvale Water Pollution Control Plan. Wastewater samples were collected on a regular basis at a cleanout located next to Eaton's neutralization system. Numerous violation notices were issued to Eaton regarding the collected samples. These violations included elevated levels of TCE, trichloroethane (TCA), dichloroethylene (DCE), and low pH. An Underground Injection Control (UIC) inspection conducted by this office on July 17, 1981 reported a leaking drum of TCE on the dirt lot behind the premises. The UIC report also stated that the waste storage facilities were uncovered and unbermed, and no formal spill plans existed. The UIC

report also noted that the information was furnished by Eaton's Operations Manager. During recent litigation deposition testimony Eaton employees had no recollection of any leaking drums in 1981 or at anytime and that a paved area was constructed for wastewater storage facilities before Eaton's operations began. In 1985, Eaton went through a formal closure of the Site before departing and presented documentation to the City of Sunnyvale after an inspection that no contamination or evidence of leaks was identified in connection with Eaton's wastewater system.

In 1985 Eaton's operations were relocated, the building was demolished and replaced with the current structure. Later in 1985, following the completion of the construction of the presently existing structure, PaineWebber Qualified Plan Property Fund Four, L.P. ("PaineWebber") purchased the underlying real estate without taking title to the recently constructed improvements as part of a ground sale leaseback financing. PaineWebber thereafter took title to the improvements by foreclosure in 1991.

There have been no known documented releases on the Site, yet groundwater has been impacted on the site with VOCs, primarily TCE, with concentrations up to 65,000 ppb. The source for this contamination must have originated on the Site.

3. **Named Dischargers:** The Board finds Eaton Corporation and Signetics Corporation as primary dischargers. (Eaton Corporation and Signetics Corporation are collectively referred to as the "Dischargers"). As past tenants and operators of the Site and based upon past chemical use, operations and waste discharges described in finding 2 above and finding 5 below, the Dischargers are primarily responsible for meeting the requirements of this Order.

The Board finds the John D. Stoddard Trust ("Stoddard") as a secondary discharger because of its past ownership and control of the property. (Stoddard is hereinafter sometimes referred to as "Secondary Discharger"). Stoddard will be responsible for compliance only in the event that the Dischargers fail to comply with the requirements of this Order.

The Board finds PaineWebber as a secondary discharger because of its current ownership and control of the property. (PaineWebber is hereinafter sometimes referred to as a "Secondary Discharger"). PaineWebber is included as a secondary discharger under this Order solely due to its status as owner of the site and not due to any action or inaction by PaineWebber resulting in the discharge of waste on the site. The Secondary Dischargers will be responsible for compliance only in the event that the Dischargers fail to comply with the requirements of this Order.

If additional information is submitted indicating that other parties caused or permitted any waste to be discharged on the Site where it entered or could have entered waters of the state, the Board will consider adding that party's name to this Order. Furthermore, if

additional information is submitted indicating that the Named Dischargers did not cause or permit any waste to be discharged on the Site, the Board will consider removing the Named Discharger from this Order.

4. **Site Hydrogeology:** The Site is located on flat to gently sloping terrain, approximately four miles south of San Francisco Bay. The Site is underlain by sedimentary deposits of clay, silt, sand, and gravel. These deposits have been subdivided into several water-bearing zones generally oriented north-south.

In general, two subzones of saturated sand and gravel are present. The upper zone ranges from 0 to approximately 18 feet in thickness. The subzone is normally encountered at approximately 18 to 23 feet below ground surface (bgs) and extends approximately 30 feet bgs with numerous discontinuous lenses under the southern perimeter of the Site. This subzone thins rapidly to the west, virtually disappearing in the northwestern corner of the Site. The thickest portions of the subzone occur along the northeastern perimeter of the Site. A deeper subzone of sand and gravel ranging from 0 to 10 feet thick appears to exist on the northern half of the Site. This deeper subzone was generally encountered at depths ranging from 30 to 35 feet bgs. General relationships at the Site suggest that the upper and lower subzones represent different positions of the alluvial drainage channels as the geologic character of the Site changed through time.

Groundwater flow direction in the shallow subzone is northeasterly while the flow direction in the deep subzone is southeasterly. Vertical upward flow gradients were observed in two temporary piezometers, while in another piezometer the flow gradient was found to be vertically downward.

5. **Remedial Investigation:** Historically a nearby monitoring well installed by an upgradient discharger has shown high concentrations of TCE. In January of this year a *Soil and Ground Water Investigation Report* (Report) was prepared by ENVIRON Corporation and subsequently submitted in February by Eaton in response to a §13267 request sent out in October 1994. Soil contamination appears to be limited to the top 2 to 5 feet. No investigation was performed directly beneath the building. It also appears that the distribution of soil contamination may have been influenced by the grading activities during razing of the old building and the construction of the new building. It is not known whether the grading activities have influenced the groundwater contamination.

The Report summarizes the work that was accomplished and what constituents were found. This phase of work included the area of the Site that was not covered by the current building and only focused on-site. Soil contamination was found throughout the Site but was most notably found towards the east and north of the Site. TCE was found at levels of less than 5 parts per billion (ppb) to 420 ppb, cis- and trans- 1,2-dichloroethene (DCE) ranged from less than 5 ppb to 85 ppb. Low concentrations of benzene (21 ppb) and total xylenes (660 ppb) were also encountered in one location.

Chemical analysis of groundwater samples indicate that the highest concentration of VOCs occurs at depths of approximately 16.5 to 25.5 feet bgs and include TCE as the predominant compound (up to 65,000 ppb). Other VOCs detected at these depths include: 1,1-dichloroethene (1,1-DCE), 1,1-dichloroethane (1,1-DCA), DCE, benzene, ethylbenzene, and total xylenes. Low concentrations of Freon 113, 1,1,1-trichloroethane (TCA), 1,1-DCA, 1,1-DCE, and TCE were found at various locations from depths of 32 to 35 feet bgs. The only TCA discovered on the Site was at these lower depths and on the west side of the Site. There does not appear to have been a discharge of TCA on that side of the property therefore TCA may be migrating onto the property. The concentration of TCE in groundwater is higher than 1% of the solubility number for TCE, which is an indication for the potential presence of dense non-aqueous phase liquids (DNAPL).

6. **Interim Remedial Measures:** Interim remedial measures need to be implemented at this site to reduce the threat to water quality, public health, and the environment posed by the discharge of waste and to provide a technical basis for selecting and designing final remedial measures.
7. **Adjacent Sites:** Several sites in the local vicinity are currently under board order. Anacomp (formerly Xidex) - 305 Soquel Way, NPEC (formerly Verbatim Corporation) - 360 North Pastoria Avenue, Data General Corporation - 433 North Mathilda Avenue, and Zymos - 477 North Mathilda Avenue are all sites that have been investigated to some extent by the board and all except Zymos are under board ordered Site Cleanup Requirements (See Figure 1).

Anacomp has submitted for review a Final Remediation Action Plan. Staff plans to prepare final site cleanup requirements for Board consideration shortly. NPEC has completed final site cleanup requirements, and Data General continues to treat groundwater under board order. The Zymos property is under review and Board staff plan to issue site investigation under Water Code Section 13267.

8. **Regulatory Status:** This site is currently not subject to Board order.
9. **Basin Plan:** The Board adopted a revised Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan) on December 17, 1986, and the State Board approved it on May 21, 1987. The Board has amended the Basin Plan several times since then. The Basin Plan defines beneficial uses and water quality objectives for waters of the State, including surface waters and groundwaters.

The potential beneficial uses of groundwater underlying and adjacent to the Site include:

- a. Municipal and domestic water supply
- b. Industrial process water supply

- c. Industrial service water supply
- d. Agricultural water supply
- e. Freshwater replenishment to surface waters

At present, there is no known use of groundwater underlying the Site for the above purposes.

The existing and potential beneficial uses of the Sunnyvale West Channel, Moffett Channel, Guadalupe Slough, and South San Francisco Bay include:

- a. Municipal and domestic supply
- b. Agricultural supply
- c. Industrial process supply or service supply
- d. Groundwater recharge
- e. Water contact and non-contact recreation
- f. Wildlife habitat
- g. Cold freshwater and warm freshwater habitat
- h. Fish migration and spawning
- i. Navigation
- j. Estuarine habitat
- k. Shellfish harvesting
- l. Preservation of rare and endangered species

10. **Other Board Policies:** Board Resolution No. 88-160 allows discharges of extracted, treated groundwater from site cleanups to surface waters only if it has been demonstrated that neither reclamation nor discharge to the sanitary sewer is technically and economically feasible.

Board Resolution No. 89-39, "Sources of Drinking Water," defines potential sources of drinking water to include all groundwater in the region, with limited exceptions for areas of high TDS, low yield, or naturally-high contaminant levels.

11. **State Water Board Policies:** State Water Board Resolution No. 68-16, "Statement of Policy with Respect to Maintaining High Quality of Waters in California," applies to this discharge and requires attainment of background levels of water quality, or the highest level of water quality which is reasonable if background levels of water quality cannot be restored. Non-background cleanup levels must be consistent with the maximum benefit to the people of the State, not unreasonably affect present and anticipated beneficial uses of such water, and not result in exceedance of applicable water quality objectives.

State Water Board Resolution No. 92-49, "Policies and Procedures for Investigation and Cleanup and Abatement of Discharges Under Water Code Section 13304," applies to this discharge. This Order and its requirements are consistent with the provisions of

Resolution No. 92-49, as amended.

12. **Preliminary Cleanup Goals:** The Dischargers will need to make assumptions about future cleanup standards for soil and groundwater, in order to determine the necessary extent of remedial investigation, interim remedial actions, and the draft cleanup plan. Pending the establishment of site-specific cleanup standards, the following preliminary maximum cleanup goals should be used for these purposes:
 - a. Groundwater: Applicable water quality objectives (e.g. maximum contaminant levels, or MCLs) or, in the absence of a chemical-specific objective, risk-based levels (e.g. drinking water equivalent levels).
 - b. Soil: 1 mg/kg total volatile organic compounds (VOCs), 10 mg/kg total semi-volatile organic compounds (SVOCs), and background concentrations of metals.
13. **Basis for 13304 Order:** The Dischargers have caused or permitted waste to be discharged or deposited where it is or probably will be discharged into waters of the State and creates or threatens to create a condition of pollution or nuisance.
14. **Cost Recovery:** Pursuant to California Water Code Section 13304, the Dischargers and Secondary Dischargers are hereby notified that the Board is entitled to, and may seek reimbursement for, all reasonable costs actually incurred by the Board to investigate unauthorized discharges of waste and to oversee cleanup of such waste, abatement of the effects thereof, or other remedial action, required by this Order.

From July 1994 through September 1995 Board staff expended 230 labor hours in the oversight of this Site. In April 1995 Board staff requested that the Dischargers reimburse the State for the oversight work being conducted at the Site. On May 10, 1995, Signetics responded in writing with "Unfortunately, Signetics is not able to respond either affirmatively or negatively to your request at this time. We will, however, advise you of Signetics' intention as soon as possible." As of September 6, 1995, Signetics has not advised the Board of their intent. On May 11, 1995, Eaton responded in writing with "Eaton must decline your request for an acknowledgment of Eaton's intent to reimburse the State for cleanup oversight work for the following three reasons:" Those reasons were then expanded upon by way of Eaton's May 11, 1995 letter.
15. **CEQA:** This action is an order to enforce the laws and regulations administered by the Board. As such, this action is categorically exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to Section 15321 of the Resources Agency Guidelines.
16. **Notification:** The Board has notified the Dischargers, the Secondary Dischargers and all interested agencies and persons of its intent under California Water Code Section 13304

to prescribe site cleanup requirements for the discharge, and has provided them with an opportunity to submit their written comments.

17. **Public Hearing:** The Board, at a public meeting, heard and considered all comments pertaining to this discharge.
18. **Disclaimer:** Statements, findings, and conclusions set forth in these Site Cleanup Requirements have been developed by the Regional Board's staff pursuant to the provisions of California Water Code Section 13304. By making such statements, findings and conclusions, the Regional Board is not attempting to apportion or allocate liability among parties identified in this Order.

IT IS HEREBY ORDERED, pursuant to Section 13304 of the California Water Code, that the Dischargers (or its agents, successors, or assigns) shall cleanup and abate the effects described in the above findings as follows:

A. PROHIBITIONS

1. The discharge of wastes or hazardous substances in a manner which will degrade water quality or adversely affect beneficial uses of waters of the State is prohibited.
2. Further significant migration of wastes or hazardous substances through subsurface transport to waters of the State is prohibited.
3. Activities associated with the subsurface investigation and cleanup which will cause significant adverse migration of wastes or hazardous substances are prohibited.

B. TASKS

1. **WORKPLAN TO COMPLETE SOURCE IDENTIFICATION**

COMPLIANCE DATE: December 13, 1995

Submit a workplan acceptable to the Executive Officer to complete the identification of all pollution sources on the site, including chemical storage areas, sumps, underground tanks, utility lines, and related facilities. The workplan should specify investigation methods and a proposed time schedule.

2. COMPLETION OF SOURCE IDENTIFICATION

COMPLIANCE DATE: 90 days after Executive Officer approval of task 1 workplan.

Submit a technical report acceptable to the Executive Officer documenting completion of necessary tasks identified in the Task 1 workplan. The technical report should identify confirmed and possible sources of pollution.

3. REMEDIAL INVESTIGATION WORKPLAN

COMPLIANCE DATE: 45 days after submittal of task 2 technical report documenting the completion of source identification.

Submit a workplan acceptable to the Executive Officer to define the vertical and lateral extent of soil and groundwater pollution. The workplan should specify investigation methods and a proposed time schedule. Work may be phased to allow the investigation to proceed efficiently.

4. COMPLETION OF REMEDIAL INVESTIGATION

COMPLIANCE DATE: 240 days after Executive Officer approval of task 3 workplan.

Submit a technical report acceptable to the Executive Officer documenting completion of necessary tasks identified in the Task 3 workplan. The technical report should define the vertical and lateral extent of pollution down to concentrations at or below typical cleanup standards for soil and groundwater.

5. INTERIM REMEDIAL ACTION WORKPLAN

COMPLIANCE DATE: 60 days after submittal of task 4 technical report documenting the completion of remedial investigations.

Submit a workplan acceptable to the Executive Officer to evaluate interim remedial action alternatives and to recommend one or more alternatives for implementation. The workplan should specify a proposed time schedule. Work may be phased to allow the investigation to proceed efficiently. If groundwater extraction is selected as an interim remedial action, then one task will be to file a "Notice of Intent" to discharge extracted and treated groundwater to waters of the State, to be covered by the VOC general permit.

6. **COMPLETION OF INTERIM REMEDIAL ACTIONS**

COMPLIANCE DATE: No later than 1 year after Executive Officer approval of the task 5 workplan.

Submit a technical report acceptable to the Executive Officer documenting completion of necessary tasks identified in the Task 5 workplan. For ongoing actions, such as soil vapor extraction or groundwater extraction, the report should document start-up as opposed to completion.

7. **PROPOSED FINAL REMEDIAL ACTIONS AND CLEANUP STANDARDS**

COMPLIANCE DATE: No later than 2.5 years after submittal of task 6 technical report documenting the completion of Interim Remedial Actions.

Submit a technical report acceptable to the Executive Officer containing:

- a. Results of the remedial investigation
- b. Evaluation of the installed interim remedial actions
- c. Feasibility study evaluating alternative final remedial actions
- d. Risk assessment for current and post-cleanup exposures
- e. Recommended final remedial actions and cleanup standards
- f. Implementation tasks and time schedule

Items b and c should include projections of cost, effectiveness, benefits, and impact on public health, welfare, and the environment of each alternative action.

Items a through c should be consistent with the guidance provided by Subpart F of the National Oil and Hazardous Substances Pollution Contingency Plan (40 CFR Part 300), CERCLA guidance documents with respect to remedial investigations and feasibility studies, Health and Safety Code Section 25356.1(c), and State Board Resolution No. 92-49 as amended ("Policies and Procedures for Investigation and Cleanup and Abatement of Discharges Under Water Code Section 13304").

Items a through e should consider the preliminary cleanup goals for soil and groundwater identified in finding 12.

8. **Delayed Compliance:** If the Dischargers are delayed, interrupted, or prevented from meeting one or more of the completion dates specified for the above tasks, the Dischargers shall promptly notify the Executive Officer and the Board may consider revision to this Order.

C. PROVISIONS

1. **No Nuisance:** The storage, handling, treatment, or disposal of polluted soil or groundwater shall not create a nuisance as defined in California Water Code Section 13050(m).
2. **Good Operation and Maintenance (O&M):** The Dischargers shall maintain in good working order and operate as efficiently as possible any facility or control system installed to achieve compliance with the requirements of this Order.
3. **Cost Recovery:** The Dischargers shall be liable, pursuant to California Water Code Section 13304, to the Board for all reasonable costs actually incurred by the Board to investigate unauthorized discharges of waste and to oversee cleanup of such waste, abatement of the effects thereof, or other remedial action, required by this Order. If the site addressed by this Order is enrolled in a State Board-managed reimbursement program, reimbursement shall be made pursuant to this Order and according to the procedures established in that program. Any disputes raised by the Dischargers over reimbursement amounts or methods used in that program shall be consistent with the dispute resolution procedures for that program.
4. **Access to Site and Records:** In accordance with California Water Code Section 13267(c), the Dischargers and the Secondary Dischargers shall permit the Board or its authorized representative:
 - a. Entry upon premises in which any pollution source exists, or may potentially exist, or in which any required records are kept, which are relevant to this Order.
 - b. Access to copy any records required to be kept under the requirements of this Order.
 - c. Inspection of any monitoring or remediation facilities installed in response to this Order.
 - d. Sampling of any groundwater or soil which is accessible, or may become accessible, as part of any investigation or remedial action program undertaken by the Dischargers.
5. **Self-Monitoring Program:** A Self-Monitoring Program shall be developed during the course of the remedial investigation. The Self-Monitoring Program shall be amended to this Order and may be amended by the Executive Officer.

6. **Contractor/ Consultant Qualifications:** All hydrogeologic documents (plans, specifications, and reports) shall be signed by and stamped with the seal of a California registered geologist, a California certified engineering geologist, or a California registered civil engineer.
7. **Lab Qualifications:** All samples shall be analyzed by State-certified laboratories or laboratories accepted by the Board using approved EPA methods for the type of analysis to be performed. All laboratories shall maintain quality assurance/quality control (QA/QC) records for Board review. This provision does not apply to analyses that can only reasonably be performed on-site (e.g. temperature).
8. **Document Distribution:** Copies of all correspondence, technical reports, and other documents pertaining to compliance with this Order shall be provided to the following agencies:
 - a. City of Sunnyvale, Department of Public Safety, (Benjamin Gikis)
 - b. Santa Clara County, Department of Environmental Health, (Lee Esquibel)
 - c. Santa Clara Valley Water District, (Tom Iwamura)
9. **Reporting of Changed Owner or Operator:** PaineWebber shall file a technical report on any changes in site occupancy or ownership associated with the property described in this Order. Upon providing evidence reasonably satisfactory to the Board that PaineWebber has transferred ownership of the site to a third party, the Board shall consider removing the name of PaineWebber from this Order and substitute the name of PaineWebber's transferee in its stead.
10. **Reporting of Hazardous Substance Release:** If any hazardous substance is discharged in or on any waters of the State, or discharged or deposited where it is, or probably will be, discharged in or on any waters of the State, the Dischargers shall report such discharge to the Regional Board by calling (510) 286-1255 during regular office hours (Monday through Friday, 8:00 to 5:00).

A written report shall be filed with the Board within five working days. The report shall describe: the nature of the hazardous substance, estimated quantity involved, duration of incident, cause of release, estimated size of affected area, nature of effect, corrective actions taken or planned, schedule of corrective actions planned, and persons/agencies notified.

This reporting is in addition to reporting to the Office of Emergency Services required pursuant to the Health and Safety Code.

11. **Secondary Discharger Responsibility:** If the Dischargers fail to comply with any provision of this Order for which they are responsible, within 60 days of the Executive Officer's determination of such failure and actual written notice to the Secondary Dischargers of such failure, the Secondary Dischargers shall then be responsible for complying with this Order. Prior to the Executive Officer's determination that the Dischargers have failed to comply with this Order, the Board shall use reasonable efforts to compel the Dischargers' compliance with this Order, including, without limitation, imposition of administrative civil liability under California Water Code Sections 13267, 13268 and or 13350.
12. **Periodic SCR Review:** The Board will review this Order periodically and may revise it when necessary. The Dischargers and the Secondary Dischargers may request revisions and upon review the Executive Officer may recommend that the Board revise these requirements.

I, Lawrence P. Kolb, Acting Executive Officer, do hereby certify that the foregoing is a full, true, and correct copy of an Order adopted by the California Regional Water Quality Control Board, San Francisco Bay Region, on October 18, 1995.



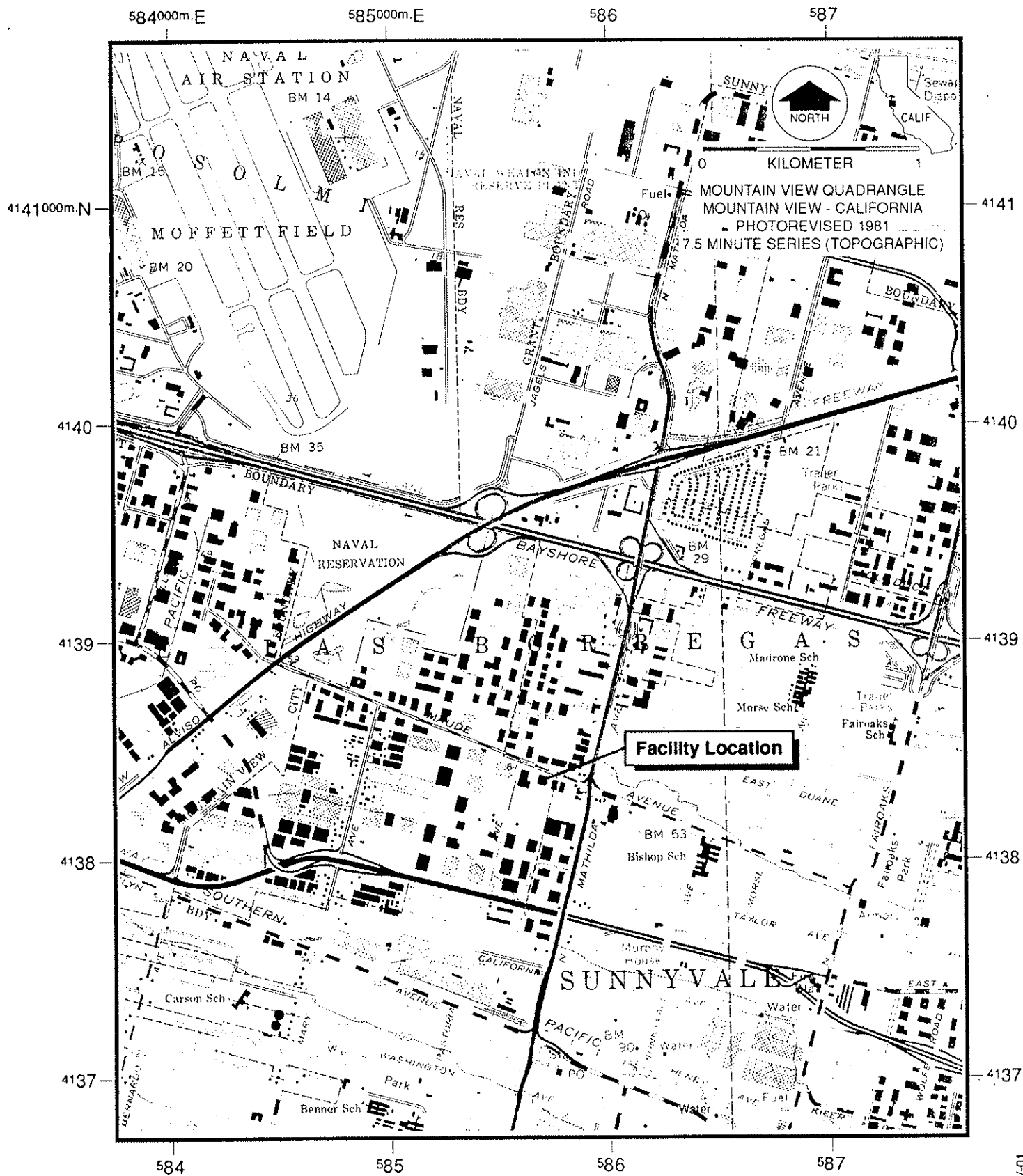
Lawrence P. Kolb
Acting Executive Officer

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FAILURE TO COMPLY WITH THE REQUIREMENTS OF THIS ORDER MAY SUBJECT YOU TO ENFORCEMENT ACTION, INCLUDING BUT NOT LIMITED TO: IMPOSITION OF ADMINISTRATIVE CIVIL LIABILITY UNDER WATER CODE SECTIONS 13267 OR 13350, OR REFERRAL TO THE ATTORNEY GENERAL FOR INJUNCTIVE RELIEF OR CIVIL OR CRIMINAL LIABILITY

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Attachments: Site Map
Figure 1



Site Map

